

May 5, 2022

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,)
D.P., A.F., C.A., R.K., K.P.,)
and T.H.,)
Plaintiffs,)

V.) CIVIL ACTION NO:
) 1:20-CV-05263-VMC

RED ROOF INNS, INC., et al.,)
Defendants.)

* * * * *
JANE DOE 1-4,)
Plaintiffs,)

V.) CIVIL ACTION NO.
) 1:21-CV-04278-WMR

RED ROOF INNS, INC., et al.,)
Defendants.)
* * * * *

PL Sum. J.
Ex. 023

VIDEOTAPED ORAL DEPOSITION OF

Volume 1 of 1
Taken May 5, 2022

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VIDEOTAPED ORAL DEPOSITION OF ,
produced as a witness at the instance of the
Defendant Red Roof Inns, and duly sworn, taken in
the above-styled and numbered cause on May 5, 2022,
from 9:13 a.m. to 6:23 p.m., before Julie Greene,
CSR No. 2847, in and for the State of Texas,
reported by machine shorthand method at the offices
of The Turley Law Firm, 6440 N. Central Expressway,
10th Floor, Dallas, Texas, pursuant to the Federal
Rules of Civil Procedure.

Job Number: 5213652

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19 ALSO PRESENT (via Zoom):

20 Ms. Juliana Mesa
Mr. Elliott Ream

21 THE INTERPRETER:

22 Mr. Randy Johnson
23
24
25

1 A. Yes.

2 Q. Do you understand that?

3 A. Yes.

4 Q. Okay. What is sex trafficking to you?

5 A. Someone who's being manipulated and
6 controlled. Someone who is being manipulated and
7 controlled and forced to have sex for money in
8 order to eat, in order to not be beat, in order to
9 have a roof over their head.

10 Q. You said manipulated and controlled and
11 forced. Those were the three verbs you used.

12 A. Yes.

13 Q. In your mind, is any one of those enough
14 to constitute sex trafficking, or does it need to
15 be manipulation and control and force?

16 MR. MCDONOUGH: Objection.

17 Q. (By Mr. Keith) He might object sometimes.
18 Unless he tells you not to answer --

19 MR. MCDONOUGH: You can answer.

20 Q. (By Mr. Keith) -- you can answer.

21 A. I think they can all play a role in that.

22 Q. I guess what I'm saying is when you -- Let
23 me ask you this way. What do you mean by
24 "manipulation"?

25 A. I was manipulated. I was lied to. I

1 wasn't told I would be going there to have sex with
2 men repeatedly on a daily basis and to make a
3 certain amount of money just so I can eat and to
4 not be beat. I wasn't told that was going to
5 happen. I was told I would have an opportunity in
6 modeling career, music videos, possibly dancing. I
7 had no idea that's what I was getting into. So he
8 lied to me and he manipulated me, and I was forced
9 to do that when I got there.

10 Q. All right. We'll go into the specifics of
11 each one, but that -- When you say "manipulated,"
12 what you just told me is specifically what happened
13 to you, and that's what you mean when you use the
14 word "manipulation;" is that right?

15 A. Yes.

16 Q. Okay. Do you know what prostitution is in
17 Georgia?

18 A. I don't know if it's the same in Georgia.
19 I have an idea of what prostitution is.

20 Q. Let me read you the legal definition, and
21 tell me if that's what you understand it to be,
22 okay?

23 A. Okay.

24 Q. "A person commits the offense of
25 prostitution when he or she performs or offers or

1 Q. Okay.

2 A. I got it confused with Extended Stay.

3 Q. Sure. Okay. So let me -- I want to just
4 try to clean up a few things today. So to be
5 clear, the Red Roof on North Druid Hills Road is
6 the only Red Roof hotel that you claim to have been
7 trafficked out of either by Bless or Bagz, correct?

8 A. Correct.

9 Q. And Bless and Bagz were the only two
10 traffickers that you've identified, and they were
11 your only two traffickers, right?

12 A. Yes.

13 Q. Okay. So setting aside the other hotels
14 for a second, okay? If I use the term "Red Roof"
15 or "Red Roof hotel," will you understand it to be
16 the one on North Druid Hills Road?

17 A. Yes.

18 Q. So I don't have to keep saying "the Red
19 Roof on North Druid Hills Road"?

20 A. No, sir.

21 Q. All right. Good. Okay. Tell me your
22 birthday, please, ma'am.

23 A. 3/5/93.

24 Q. And I know my mom told me not to ask this,
25 but I have to ask it for the record. How old does

1 that make you?

2 A. 29.

3 Q. 29. Okay. And how old were you when
4 you -- Let me ask this: Do you -- Do you -- Do you
5 allege and is it your contention that your
6 trafficking started when you came to Atlanta to
7 meet Bless?

8 A. Yes.

9 Q. So you do not claim that you were
10 trafficked at any time before the flight to Atlanta
11 and meeting Bless, correct?

12 A. Correct.

13 Q. Tell me how old you were when you met
14 Bless.

15 A. 16. Maybe 17.

16 Q. That's a big difference, okay? So I need
17 to -- I --

18 (Sotto voce discussion.)

19 Q. (By Mr. Keith) Okay. Your complaint
20 alleges that from approximately 2009 through 2011
21 that you were trafficked at the Atlanta Red Roof
22 hotel. Are those -- Those years I don't think
23 match up with what you actually put in your
24 interrogatory responses. So what I'm trying to
25 figure out is do you know when it was that you

1 actually went to Atlanta? And I tell you that
2 because I've shown you Exhibit 2, which is your
3 interrogatories, if you want to look on page 18.
4 And I'm going to reach over and point. So do you
5 see right here where it says "T.H. was trafficked"?
6 You understood -- And by the way, you understand
7 throughout here when it says "T.H." that's you,
8 right?

9 A. Yes.

10 Q. So it says "T.H. was trafficked from about
11 spring of 2010 through late 2011 or early 2012 at
12 various hotels, and then it goes on to list hotels,
13 okay?

14 A. Uh-huh.

15 Q. So I need to know. Are you alleging that
16 it was from approximately -- that it was from 2009,
17 or was it from the spring of 2010?

18 A. In the beginning, there was a little
19 confusion if it was at the end of 2009, but we've
20 confirmed that it was spring 2010 when I first went
21 to meet Bless.

22 Q. Okay. So that would have put you at 17
23 then, right?

24 A. If I did the math.

25 Q. Well, your birthday's -- your birthday's

1 --

2 A. '93.

3 Q. -- in the first week of March, right?

4 A. Yes.

5 Q. So spring would be March, April, May,
6 right?

7 A. Okay.

8 Q. So '93 to 2010, assuming that it wasn't in
9 the first four days of March, that would make you
10 17, right?

11 A. Okay.

12 Q. You agree with that?

13 A. I agree.

14 Q. All right. So is it fair to say that you
15 started the ordeal that we're here to talk about
16 when you were 17?

17 A. Yes.

18 Q. And what hotel was that initial
19 trafficking out of?

20 A. Extended Stay.

21 Q. And I know that in there there was a
22 little confusion in the interrogatory responses.
23 It says it could have been at the one on Leland
24 Avenue in, I think that's Marietta, or it could
25 have been this one on West Interstate North. It's

1 back home -- or you came back to Texas, and you
2 spent a month or so in Texas, right?

3 A. Yes.

4 Q. So then -- So let's go Bagz part one, all
5 right? You go back in 2010 to Bagz, stay the rest
6 of 2010, and you escape in early 2011; is that
7 right?

8 A. Yes.

9 Q. So do you know how many months you were
10 in, excuse me, how many months you were in Atlanta
11 in 2010?

12 A. The first time?

13 Q. No, no, with Bagz. Yes. With Bagz the
14 first time.

15 A. Okay. Maybe six to eight months. Six to
16 eight months.

17 Q. Six to eight months. So that would have
18 been from May to the end of the year or June to the
19 end of the year, something like that?

20 A. Something around May -- May, June. Yeah.
21 Till the end of the year, plus -- plus some.

22 Q. Right. I know you were into the next
23 year. I'm just trying to figure out --

24 A. Yeah.

25 Q. And then when in 2011 did you leave?

1 Winter?

2 A. The first time?

3 Q. Uh-huh. Yes.

4 A. It could have still been winter.

5 Q. Okay. So you were here and then -- You
6 were here in Texas for a couple of months, and then
7 you went back up in 2011 where you stayed for a
8 month. Do you know what time of the year that was,
9 your second go-round with Bagz in Atlanta?

10 A. I don't remember.

11 Q. And then part three when you went to
12 Florida, and then he took you back to Atlanta for
13 the week, do you know when that was? Was that 2011
14 or 2012?

15 A. 2011.

16 Q. So you were done by 2011? You were over
17 there for a week?

18 A. Yeah. I was done before 2012.

19 Q. Okay. So -- Okay. Good. So we now know
20 we can narrow this down. It was spring of 2010
21 through 2011, not 2012?

22 A. Correct.

23 Q. Gotcha. Okay.

24 MR. KEITH: Y'all want to take break?

25 MR. MCDONOUGH: Sure.

1 psychiatric hospital for drug abuse, right?

2 A. No. I wanted to go. I told my mom to
3 bring me.

4 Q. We'll go through that.

5 A. I was -- I didn't know how to handle the
6 loss of a parent, and it consumed me, so I asked
7 for help.

8 Q. So you claim the trafficking started with
9 Bless while you were 17, right?

10 A. Yes.

11 Q. And we can agree that you would have been
12 17 between [REDACTED] of 2010, and [REDACTED] of
13 2011, right?

14 A. Say that again.

15 Q. Sure. Your birthday's [REDACTED], right?

16 A. [REDACTED]

17 Q. [REDACTED] Okay. So you would have been
18 17 between -- on [REDACTED] 2010?

19 A. Yes.

20 Q. And you would have been 18 on [REDACTED],
21 2011, right?

22 A. Yes.

23 Q. So between [REDACTED], 2010, and [REDACTED],
24 2011, you were 17?

25 A. Yes.

1 distinct traffickers, right? Bless and Bagz,
2 right?

3 A. Yes.

4 Q. When you were with these guys, what did
5 you call them?

6 A. I don't remember what I called Bless, but
7 sometimes I called Bagz Daddy.

8 Q. Did you ever call them by their real
9 names?

10 A. I don't remember. We were -- No. I may
11 have called Bagz Bagz a few times, but generally,
12 we referred to him as Daddy.

13 Q. Who's "we"?

14 A. The girls.

15 Q. And who were the girls?

16 A. [REDACTED] or any other girl that he had.

17 Q. How many girls did he have during the time
18 that you were with him for that year or so time
19 period?

20 A. The first time, it was primarily me and
21 [REDACTED] --

22 Q. Okay.

23 A. -- that I can remember. The second time
24 when I went back with [REDACTED] it was [REDACTED]

25 Q. [REDACTED]?

1 leave.

2 Q. But did he kidnap you?

3 A. I think through fear and manipulation and
4 previously me seeing him put his hands on the
5 girls, specifically [REDACTED] I went with him.

6 Q. Did he put hands on you?

7 A. Yes.

8 Q. When?

9 A. In a hotel room. I fell asleep when I
10 wasn't supposed to be sleeping. And he was
11 knocking on the door, and I didn't hear him because
12 I was sleeping. And when I opened the door, he put
13 his hands around my throat and choked me out and
14 put me on the bed and was choking me out, so I
15 almost blacked out. And I -- Since then, I
16 never -- I didn't try nothing with him.

17 Q. That wasn't at the Red Roof, though, was
18 it?

19 A. I don't remember. I just have a memory of
20 that happening.

21 Q. So you can't state one way or the other if
22 that assault on you happened at the Red Roof?

23 A. I can't.

24 Q. What hotels were you at the most with
25 Bagz?

1 2, you claim that those were all Bagz, and the
2 Leland Drive one was also Bless, right?

3 A. Correct.

4 Q. Okay. When you were with him, you claim
5 to have been trafficked out of or at the Red Roof?

6 A. With Bagz.

7 Q. Correct. Yes or no?

8 A. Oh, with Bagz. Yes.

9 Q. Okay. Do you know how many times?

10 A. Probably stayed there for three to five
11 days, sometimes a week once a month, so maybe six
12 to eight months if we were still in that area,
13 because he would travel around for a weekend here
14 and there. But that was one of the hotels that was
15 in rotation that he seemed the most comfortable at.

16 Q. So three to five days once a month during
17 the whole time you were with him?

18 A. Yes.

19 Q. Okay. Who's Fresh?

20 A. If I can remember correctly, that was
21 another pimp that he traveled with. They generally
22 traveled in groups.

23 Q. And that's what -- You think of Bagz as a
24 pimp?

25 A. Yes.

1 he's really good at that. At the beginning, that's
2 all it is is mental and emotional manipulation.
3 And then I have seen him physically -- Like, Bless
4 would be -- hit [REDACTED] in the same room as us. He
5 doesn't necessarily have to -- if you see someone
6 getting beat up in front of you really bad --

7 Q. Did you say Bless would beat [REDACTED]

8 A. Bless beat [REDACTED] the first time I got to
9 the hotel.

10 Q. Okay. I'm not talking about Bless.

11 A. Right. Sorry. It was a memory that
12 popped up.

13 Q. Okay. I got confused.

14 A. Yeah. I'm getting a little confused.

15 Q. Do you want to take a break?

16 A. No, not yet.

17 Q. Not yet?

18 MR. MCDONOUGH: I don't know where you
19 are, but I need to take break in the near future to
20 the restroom.

21 MR. KEITH: No.

22 Q. (By Mr. Keith) Okay. So let's talk about
23 this. So it says -- So you knew Ms. [REDACTED] -- You
24 knew Ms. [REDACTED] from high school?

25 A. Yes.

1 Q. Right? So she was not in that life, the
2 life that you and [REDACTED] were in before you took
3 her to Florida to try to save [REDACTED] and Bagz
4 convinced her to join him; is that right?

5 A. Innocent. I didn't bring her. She went
6 with me. I didn't force her to go. She -- Me and
7 her wanted to go get [REDACTED] together.

8 Q. I'm not suggesting you kidnapped her.
9 Y'all went together.

10 A. Yeah.

11 Q. She joined you on your trip to Florida to
12 see [REDACTED]

13 A. Yes. It was our trip. Yes.

14 Q. And at which time she met Bagz?

15 A. Bagz had shown up. Yes.

16 Q. Bagz convinced her to join his crew,
17 right?

18 A. You know, we all came from generally
19 broken families, and, you know, coming from a
20 underage girl, doesn't really have anything, and
21 he's promising, you know, like I said again,
22 modeling and all this stuff. He completely
23 manipulated her, and she ended up -- Yes. We both
24 ended up going back with them.

25 Q. Was she -- Was she underage at that time?

1 A. Yes.

2 Q. Were there other -- Were there other women
3 that were in different rooms in the same hotel that
4 were working for Bagz when you two were there?

5 A. I have memory of being at the same hotels
6 where there's multiple pimps there, and they have
7 multiple girls.

8 Q. Okay.

9 A. But as far as Bagz, my memories are with
10 me and [REDACTED] in the same room.

11 Q. So then --

12 A. If there was a lot more girls, I'm sure
13 there'd be another room.

14 Q. Or another hotel?

15 A. I don't -- I don't know. I can't say yes.
16 I don't -- I don't know.

17 Q. Where was [REDACTED] during the time that
18 you -- This last go-round, where was [REDACTED]

19 A. [REDACTED] was at the -- When we -- When I
20 went, all I remember is going back to an apartment,
21 and there was multiple girls there, and it was just
22 too much going on. And I -- I'd have to say I was
23 there for maybe a few days to a week, and I was
24 able to get away.

25 Q. At the hotel -- I mean, at the apartment?

1 during the time period that you were involved with
2 Bagz. Is that fair?

3 A. Yes.

4 Q. Okay.

5 A. In 2011. Yes.

6 Q. Okay. So let me ask you this: Did -- So
7 now we're on to Bagz. Did Bagz have a quota?

8 A. Yes.

9 Q. And what was his quota?

10 A. A thousand dollars a day.

11 Q. Okay. And did he charge the same prices
12 that Bless did?

13 A. Between a hundred to 200.

14 Q. Okay. So it was still -- So it was still
15 going to be between five and ten men?

16 A. Yes. Sometimes it'd go 15. A thousand
17 was the minimum. To eat, we had to make a thousand
18 dollars.

19 Q. So could you give me an average?

20 A. I'm just going to say a thousand, then.

21 Q. No, and that's fine, but could you give me
22 an average of how many men a day you saw while you
23 were staying at this Extended Stay on Interstate
24 North during the time that you were with Bagz?

25 A. Five to ten minimum. If there was more

1 calls -- We weren't allowed to sleep at night, so
2 we were at posts in the morning and lunch,
3 dinnertime, midnight, middle of the night.

4 Q. When did you sleep?

5 A. I don't even -- We slept when we could.

6 Q. Were you on drugs during this time?

7 A. I may have smoked marijuana a few times
8 and some alcohol. But generally, Bagz wanted us
9 sober to be focused on the clientele and to make
10 him money.

11 Q. You weren't doing anything -- any uppers
12 to keep you awake?

13 A. No. I remember surviving off of Snickers
14 bars and Red Bulls.

15 Q. That's not a very healthy diet.

16 A. No. We generally ate at the vending
17 machines when we were hungry.

18 Q. Okay. So if we're looking at -- If you're
19 saying it's average between five and ten, can we
20 say that the -- if we had to put a number for
21 averages, seven and a half men? Because you're
22 seeing at least five men a day, right, if they're
23 paying 200? If you got five 200s, you'd meet your
24 minimum, right?

25 A. I'm going to do closer to ten, because

1 there was times -- multiple times where we made
2 more than a thousand, and there's times where --
3 You see, me and [REDACTED] always shared a room. So
4 when her customer would come over, I'd either be in
5 the bathroom, or sometimes we'd be so tired that we
6 would ask them if I could join in, because she was
7 so exhausted, and we just wanted it to get over
8 with quicker.

9 Q. So y'all had --

10 A. So sometimes we shared customers.

11 Q. Did that cost them extra?

12 A. Yeah.

13 Q. So you -- I was going to ask later, but
14 you did have group sex during your time with Bagz?

15 A. With customers.

16 Q. Right. [REDACTED] and customers, right?

17 A. Me, [REDACTED] and -- Yeah, [REDACTED] and me,
18 yeah.

19 Q. Did you ever have sex with Bagz?

20 A. I never had sex with Bagz.

21 Q. Did you ever have sex with Bless?

22 A. No. Bagz did force me to perform oral on
23 him on multiple occasions, I guess to remind me
24 that I was his.

25 Q. I'm sorry, did you say Bless or Bagz?

1 hotel room, not picking them up.

2 Q. Is it fair to say that the damages, the
3 impact that this has had on you is primarily
4 emotional and mental?

5 A. I think it's physical too.

6 Q. Well, how so? You've told me about the
7 choke -- the one choking incident.

8 A. Yes.

9 Q. Were you ever hurt other than that one
10 incident you describe where you were asleep?

11 A. Through Bagz, no. I -- I've seen him
12 literally punch my friend [REDACTED] in the face
13 multiple times till she was black and blue and
14 swollen, and I never wanted to try anything with
15 Bagz.

16 Q. So whatever that effect had on you, that's
17 mental, because he wasn't beating you up like that,
18 right?

19 A. Okay.

20 Q. Okay. So I'm just asking you. Did Bless
21 beat you up at all?

22 A. No.

23 Q. Okay. We talked about the one time with
24 Bagz where he laid hands on you and choked you.

25 A. Yes.

1 Q. Did any john beat you up?

2 A. No. I've witnessed them -- I've witnessed
3 two of them do that to [REDACTED] in front of me,
4 though.

5 Q. What did they do?

6 A. I was -- I was in the -- One of them
7 pulled a gun on her and made her perform oral sex
8 on him and took the money back and left. And then
9 Bagz beat her up for, I guess, allowing that to
10 happen, which is not her fault. And one of them
11 didn't like the service me and her did and punched
12 her and grabbed the money and ran out. I was very
13 fortunate those things -- I was very fortunate that
14 that didn't physically happen to me. But
15 unfortunately, I got -- that happened to my friend,
16 and I had to witness that.

17 Q. You saw that, and you were scared?

18 A. Absolutely.

19 Q. Okay. The Microtel, since it was in the
20 rotation, was it the same three to five days once a
21 month?

22 A. Yes.

23 Q. Average ten men there too?

24 A. Yes.

25 Q. If I'm -- If I'm doing this right, the

1 three that are in the rotation are the Extended
2 Stay on Interstate North, the Microtel on Corporate
3 Boulevard, and the North Druid Hills Red Roof,
4 right?

5 A. Please repeat that.

6 Q. Sure. Why don't you tell me. What are
7 the ones that are in the rotation?

8 A. The Red Roof Inn, the Microtel, and the
9 Extended Stay off of 35.

10 Q. When you say off 35?

11 A. I'm sorry, I said 35. West Interstate
12 North Parkway.

13 Q. Okay. And when y'all were in town and
14 when you were with Bagz, not those times that you
15 were in Texas, clearly, you were staying basically
16 one week or five days at the -- five days at one
17 hotel, five days at another hotel, five days at
18 another hotel of those three, right?

19 A. Yes.

20 Q. And then the other days of that month --
21 of the month that you were not traveling would have
22 been these other hotels we've talked about?

23 A. Yes. Wait, repeat -- repeat the question.

24 Q. Let me ask you this: We now have --
25 Basically, we have 15 days of the month covered.

1 Where was the rest of the time that you spent when
2 you were in Atlanta?

3 MR. MCDONOUGH: Objection.

4 Q. (By Mr. Keith) Correct. We have
5 between -- We have between nine and 15 days
6 covered?

7 MR. MCDONOUGH: Objection.

8 Q. (By Mr. Keith) Where were you spending
9 the rest of the time?

10 A. I said three to five days, but it would
11 probably be more five to seven.

12 Q. Okay. Then we've got three weeks out of
13 the month. Where were you spending the rest of the
14 time?

15 A. To my memory, I was at those hotels. If
16 we happened to take a trip that month, then out of
17 state. But to my memory, we'd either be at those
18 hotels or out-of-state trip or -- I don't know.

19 Q. Those three hotels you saw -- you spent
20 about the same amount of time and saw about the
21 same amount of men at; is that right?

22 A. Yes.

23 Q. Okay. Have you sued Microtel?

24 A. No.

25 Q. Other than advice from your counsel, why

1 trauma when I [REDACTED], I had a pretty decent
2 upbringing. Besides that and the confusion with my
3 birth mother and father's suicide, there was --
4 Besides all the trauma-related stuff, I had the
5 same roof over my head. I had stability, you know.
6 And once that all just fell apart, I mean, you're
7 looking at, what, a year and a half after my whole
8 life falling apart, of -- I've had no guidance, no
9 direction since I was 16.

10 Q. Is that why you listened to somebody
11 telling you to come to Atlanta with the dream of
12 becoming a model?

13 A. It wasn't even -- Yeah, becoming a model
14 or -- It's not even about becoming a model. It was
15 just about trying to -- He said we were family.

16 Q. Who said that?

17 A. Bagz. He said we were family.

18 Q. When did he tell you that?

19 A. When I was with him. He just messed with
20 my mind so much.

21 Q. Well, I'm not even talking about Bagz now.
22 I'm talking about Bless, the first one you went up
23 there for. You're 16 years old, excuse me, 17
24 years old. Why in the world are you getting on an
25 airplane to go meet a man that you don't know that

1 Q. (By Mr. Keith) Bagz part three was a
2 rescue attempt by you and [REDACTED] of [REDACTED] where
3 y'all met in Florida, correct?

4 A. Yes.

5 Q. And during that time, with his powers of
6 persuasion or manipulation, Bagz brought [REDACTED] into
7 his fold, correct?

8 A. Yes.

9 Q. And during that time, he also convinced
10 you to go back to Atlanta, correct?

11 A. Yes.

12 Q. And you went back and stayed about a week
13 in his apartment after that, right?

14 A. Yes.

15 Q. And you escaped or left and never to be
16 seen by Bagz again, right, after that, correct?

17 A. Yes.

18 Q. So if those pictures are taken in April of
19 2011, in April of 2011, your time with Bagz was
20 done in April of 2011, right?

21 A. I guess so.

22 Q. Okay. So now we've lopped off all of
23 2012, and we've now lopped off 20 -- most of 2011,
24 right? How long were you really with Bagz?

25 A. I don't know.

1 (Off record 3:33 - 3:48)

2 THE VIDEOGRAPHER: We're on the record
3 at 3:48.

4 Q. (By Mr. Keith) All right, ma'am. Took a
5 break. Talk about your deposition during the
6 break?

7 A. No.

8 Q. Talk about your testimony during the
9 break?

10 A. No.

11 Q. Did you talk to anybody during the break?

12 A. Yes.

13 Q. Who did you talk to?

14 A. My attorneys.

15 Q. What did you talk about?

16 A. The weather.

17 Q. All right. Were you ever involved in
18 having sex in exchange for drugs, money, or
19 anything else of value before you met Bless?

20 A. Please repeat the question.

21 Q. Were you ever involved in having sex for
22 money, drugs, or anything of value before you
23 met -- before you met Bless?

24 A. No.

25 Q. Please explain to me how you came to be

1 trafficked by Bless.

2 A. Me and [REDACTED] spoke to Bless on the
3 phone. He was promising an opportunity in music
4 videos, modeling, dancing.

5 Q. Who met Bless first?

6 A. I think [REDACTED] met Bless on Facebook.

7 Q. Just out of the blue?

8 A. Yes.

9 Q. She friended him or he friended her?

10 A. I don't know.

11 Q. Were you friends with him on Facebook?

12 A. No.

13 Q. Did you have a Facebook account back then?

14 A. I don't know.

15 Q. If you did, would it have been the [REDACTED]

16 [REDACTED] one that we just saw?

17 A. Yes.

18 Q. When did you -- When did you lose access
19 to that account?

20 A. I don't know. It's been many years, many,
21 many years. My personal access, I was able to
22 access it through my mother's phone.

23 Q. When you and [REDACTED] started talking to
24 Bless, did you know that [REDACTED] was already
25 involved in the commercial sex industry?

1 A. He did beat her up, because she had
2 bruises on her after she came out of the bathroom.

3 Q. How long did that -- How long did that
4 beating up, to use your words, take?

5 A. I don't know. I feel like it was fairly
6 quick.

7 Q. So there was --

8 A. It happened so fast.

9 Q. Okay. So there was a time that you and
10 [REDACTED] were alone in the room that he had taken
11 [REDACTED] into the bathroom and was beating her where
12 you could hear it, and y'all didn't run?

13 A. We froze.

14 Q. Okay. You didn't think to yourself, man,
15 we should get out of here?

16 A. Of course I did.

17 Q. So why didn't you get out of there?

18 A. I'm in another state in a hotel room, and
19 he just beat a girl basically in front of us. I
20 didn't know where I was supposed to go. We just
21 froze.

22 Q. And then he gave you a hundred bucks and
23 put you in a taxicab to go get some underwear, and
24 you did that and came back?

25 A. He must have done it before the [REDACTED]

1 Q. And low and behold, you hook up on
2 Facebook and -- Did I understand that correctly
3 from your interrogatory responses?

4 A. We connected with each other some way,
5 possibly Facebook.

6 Q. Would that have been under the [REDACTED]
7 [REDACTED] Facebook account --

8 A. I don't know.

9 Q. -- that we can't access now?

10 A. I don't know. I don't know how we got
11 back in contact with each other. I was assuming
12 that way. But somehow we got in touch with each
13 other.

14 Q. How did she convince you to come back to
15 Atlanta?

16 A. Well, she didn't. Bagz did.

17 Q. So a guy who -- So now we're on guy number
18 two who you've never met, you're talking to on the
19 phone now, right?

20 A. Yes.

21 Q. What's he telling you?

22 A. Basically, they promised -- The same
23 story, basically. They each have their own way of
24 telling it.

25 Q. Right. And you believed it the second

1 time too?

2 A. Yeah. I think he -- I think he, like,
3 sent me money. I think he -- I think he sent me
4 money to get on a plane.

5 Q. So you went voluntarily to meet him,
6 right?

7 A. Yes.

8 Q. And you stated in your interrogatories
9 that he manipulated you into having commercial sex.
10 And you explained that to me that he told you he
11 was going to get you stuff, get you into movies, I
12 mean, into modeling and into music videos and a lot
13 of the same stuff that Bless already had told you?

14 A. Yeah. He was kind of actually backing up,
15 though. He actually had a music studio and music
16 getting done. He had photographer friends, and it
17 seemed believable.

18 Q. Was he producing anybody or -- You say a
19 music studio. What do you mean?

20 A. I don't know. He just had a music studio.

21 Q. PIVIP?

22 A. No. I think that came after -- after my
23 time with him. I don't know.

24 Q. When you got up to Atlanta -- So you flew
25 up to Atlanta by yourself, right?

1 A. Yes.

2 Q. And your interrogatory responses say that
3 he was buying you nice stuff and being -- putting
4 you up in nice places and being really sweet to
5 you; is that right?

6 A. Yeah. He picked me up, and I think he
7 bought me a nice outfit and took me out to eat at a
8 nice restaurant, put me in a nice hotel. It was
9 very convincing at first.

10 Q. How long did this convincing last?

11 A. Well, that night he tried to have sex with
12 me. I declined, and he forced me to perform oral
13 on him.

14 Q. So that didn't really last very long,
15 then, did it?

16 A. No.

17 Q. So this whole thing about him buying you
18 nice stuff and all that, it lasted about as long as
19 it took you to get to the nice hotel room, right?

20 A. Yeah.

21 Q. Why didn't you -- Why didn't you decline
22 the oral sex?

23 A. I did.

24 Q. He forced you?

25 A. Yes.

1 Q. Now, sex trafficking has been referred to
2 in some papers around this case as modern-day
3 slavery. Have you ever heard that?

4 A. No.

5 Q. Do you agree with that?

6 A. Yes.

7 Q. How many times were you trafficked at the
8 North Druid Hills Red Roof before your 18th
9 birthday?

10 A. I'm going to say six to eight times we
11 were there, all within three to five days each
12 visit, sometimes seven.

13 Q. So how many times before 18, before you
14 turned 18 were you trafficked there? That was your
15 total numbers.

16 A. I don't know, but six to eight times, and
17 each time it was three to five days.

18 Q. You told me over the whole time that you
19 were with Bless, excuse me, that you were with Bagz
20 that you were there six to eight times. And I'm
21 asking you before you turned 18, how many of those
22 six to eight times were you there?

23 A. I don't know.

24 Q. There was a note in here about Bagz not
25 wanting you to see black men.

1 A. I think they were just called disposable
2 because you can just buy them.

3 Q. Why were you using those types of phones
4 instead of ones that were connected to somebody's
5 name and account?

6 A. I don't know. That's the phones that Bagz
7 just told us to use.

8 Q. When you were being trafficked, did you
9 use your real name with any client?

10 A. No.

11 Q. Why not?

12 A. I don't know.

13 Q. Did you ever tell any client that you were
14 being held against your will?

15 A. One moment. Let me think. Yes.

16 Q. Who?

17 A. Yes, I did. I don't remember. I don't
18 know his name.

19 Q. What came of that?

20 A. I think it was when [REDACTED] -- when me and
21 [REDACTED] went with Bagz back to Georgia. I think the
22 way that I left that one time, I told a customer --
23 customer, I guess that's what you call them -- he
24 was really kind. He brought me -- He brought me to
25 the bus station, and he said -- told me to say the

1 Father's prayer. It's funny. It's ironic, given
2 how we met. But yeah. He brought me to the bus
3 station and paid for my bus ticket.

4 Q. So the first time that you left Bagz, how
5 did you get away?

6 A. I think it was -- One moment. Please give
7 me time to answer.

8 Q. Take all the time you need.

9 A. The first time I left Bagz, there was a
10 raid at the Extended Stay. All the pimps were
11 there. They were raided, looking for Bless. When
12 the police got there, all the pimps jumped out
13 their windows, and I saw that as an opportunity to
14 get away.

15 Q. They were there looking for Bless?

16 A. Yes. Bless had a warrant out for his
17 arrest, I think.

18 Q. So I'm just -- I'm confused. When you
19 escaped Bagz, Bless was still at the ESA?

20 A. When I escaped Bagz, I was at the ESA, and
21 there was multiple pimps there.

22 Q. Uh-huh.

23 A. There was a raid. They were there to look
24 for Bless.

25 Q. Okay. Your former trafficker?

1 A. Yes.

2 Q. Okay. Was he mad that you were working
3 for somebody else at this juncture?

4 A. I don't know.

5 Q. Okay. So they -- So all the pimps, you
6 said, jumped out the window?

7 A. Yeah.

8 Q. Okay. And you saw that as a way to
9 escape?

10 A. Yes.

11 Q. And what did you do?

12 A. I grabbed my bag. I opened the hotel room
13 door. There was an officer standing to my left. I
14 turned to the right. He stopped me and asked me
15 where I was going, and I said "I have a taxi
16 waiting for me. I have a bus to catch." He let me
17 go. I went to the stairs on the right and went
18 down to the second floor and waited for the taxi,
19 got in the taxi, and left to the bus station.

20 Q. So you had called a taxi?

21 A. Yes.

22 Q. From the hotel room?

23 A. Yes.

24 Q. And then you got in the taxi, went to the
25 Greyhound station, and left Atlanta?

1 A. Yes.

2 Q. So we know that that's got to be somewhere
3 in December, right? Around December, because you
4 were --

5 A. Yes.

6 Q. -- ticketed?

7 A. Yes.

8 Q. Now, let me ask you this: Could you have
9 been posting those photographs on December 12th
10 while you were already in Texas?

11 A. I don't know.

12 Q. You don't know yes or no, correct?

13 A. Yeah. I don't -- I don't know. I don't
14 know if I could have been.

15 Q. All right. Well, let me ask you this:
16 Once you were out that first time, did you think
17 I'm out, I'm done, I'm not going back?

18 A. Yes.

19 Q. You made up your mind you weren't going
20 back, correct?

21 A. Yes.

22 Q. And yet you did?

23 A. Yes.

24 Q. Not just once; twice?

25 A. Yes.

1 your name?

2 A. No.

3 Q. Whose name were they under?

4 A. They would have to be under Bagz's name.

5 Q. Okay. Did you ever go to the front desk
6 to pay for rooms?

7 A. Repeat the question, please.

8 Q. Did you ever go to the front desk to pay
9 for rooms?

10 A. Yes.

11 Q. How did you pay?

12 A. Bagz would put the room in his name, and
13 we just -- He'd pay for a night. The next day room
14 service would come and knock on the door and ask if
15 we were staying another night, and then me and
16 [REDACTED] would generally walk together and pay cash
17 for that next night at the front desk.

18 Q. Did you ever actually do the checking in
19 to the hotel?

20 A. Not that I remember.

21 Q. How many rooms did he rent at a time when
22 you were at the Red Roof?

23 A. Generally one, sometimes two if he --
24 Wherever we went, sometimes there would be a second
25 room. He would make us work out of one room, and

1 A. No. But I've seen him multiple occasions
2 flash his gun around. I've seen him physically
3 beat people in front of me. I don't think you have
4 to -- I think that's just enough for someone to be
5 a little scared of what happens if you do say no.

6 MR. KEITH: Objection.

7 Q. (By Mr. Keith) Did he threaten you --

8 MR. ALLUSHI: Same objection.

9 Q. (By Mr. Keith) Did he threaten you with
10 force or violence --

11 A. No.

12 Q. -- to go back to Atlanta with him?

13 A. No.

14 Q. How did you escape from him the second
15 time?

16 A. I think that's the memory where I have
17 where I had a customer bring me to the bus station.

18 Q. So the first time was the pimps jump out
19 the window and you called a cab and got out?

20 A. Yes.

21 Q. The second time was the guy -- the
22 customer who was kind and took you to the bus
23 station and you got away?

24 A. Yes.

25 Q. How long were -- How long was that second

1 when you went back with [REDACTED] How long were
2 y'all there?

3 A. Probably a couple weeks.

4 Q. Okay. And then you went back to Texas
5 after the guy took you to the bus station, right?

6 A. Yes.

7 Q. And then how long were you in Texas before
8 you and [REDACTED] decided to go save [REDACTED]

9 A. Probably a couple weeks, couple months.

10 Q. Couple of weeks, couple of months?

11 A. Maybe. I don't know.

12 Q. That's a big difference.

13 A. I don't know.

14 Q. Tell me how he convinced you to come back
15 to Atlanta when he showed up in Florida.

16 A. He just had that power over me.

17 Q. Well, he didn't flash a gun at you, did
18 he?

19 A. Don't have to.

20 Q. You've got to answer my questions, please.
21 He didn't flash a gun at you, did he?

22 A. No.

23 Q. He didn't kidnap you and force you into a
24 car, did he?

25 A. No.

1 he would have another room for his personal room.

2 Q. So he was -- When he was running, he would
3 stay at the hotel?

4 A. What was that?

5 Q. When he was running y'all, he was staying
6 at the hotel with y'all?

7 A. He'd have his own room, yes, sometimes.

8 Q. Sometimes he wouldn't stay at the hotel?

9 A. Majority of the time he'd stay where we
10 stayed. Sometimes he'd disappear for a few -- He'd
11 say he's going to disappear for an hour or so, but
12 sometimes it'd turn into a day, but we never knew.
13 He always kept us kind of on the edge, don't really
14 know when he's going to leave or show up.

15 Q. So did you have to stay in the room,
16 basically?

17 A. We worked out of the room. We worked out
18 of the room, but there's plenty of times where we'd
19 go on the -- I specifically would go on the balcony
20 and smoke outside. Sometimes I'd see other girls
21 working, girls smoking outside.

22 Q. And how would you dress when you were
23 going out there to smoke?

24 A. We always dressed to impress. We
25 always -- We had to present a specific image. We

1 had to uphold that image.

2 Q. Were you scantily dressed looking like
3 prostitutes?

4 A. We were dressed like -- Yes. We had to
5 wear heels. We had to wear dresses. We had to
6 dress provocative.

7 Q. But you weren't half naked, right?

8 A. No.

9 Q. You weren't scantily clad, correct? You
10 were dressed up?

11 A. We were dressed up. I mean, sometimes our
12 ass would hang out or we'd have a lot of cleavage
13 showing. But if we were visible, like there could
14 be potential customers outside, so --

15 Q. You were dressed sexy?

16 A. As sexy as a young lady could look, I
17 guess.

18 Q. Did you ever call the front desk when you
19 were at the Red Roof?

20 A. I don't know. All I know is that we'd go
21 to the front desk, and we'd pay cash. If we got
22 hungry, we'd go to the vending machines and get
23 food.

24 Q. Did you ever call for housekeeping to come
25 to your room?

1 A. They showed up every night, because we
2 only would pay for one night. I'm sorry. They
3 showed up every morning because we'd only pay for
4 one day.

5 Q. And did you let them in?

6 A. Yes. They often cleaned our room, give
7 us -- We asked for linens and towels every day.

8 Q. Did you ask for a lot of towels? Did you
9 ask --

10 A. Yes.

11 Q. How many towels were you asking for?

12 A. I don't have a specific number. I just
13 know that we needed a lot of towels, because we'd
14 have to clean up the customers afterwards.

15 Q. Okay. But were these big -- Were those
16 the full towels or the hand towels?

17 A. Both.

18 Q. Did you ever turn away housekeeping?

19 A. No, not that I remember. I don't think
20 so, because we always needed new linens and towels
21 and our trash taken out, because there was
22 oftentimes a lot of used condoms in there.

23 Q. How many is a lot?

24 A. Five to ten for me, five to ten for
25 another girl. Sometimes 20-plus condoms a day in

1 there.

2 Q. You always used condoms?

3 A. Yes. There'd be lube and boxes of condoms
4 in the room, and it was clearly a working room.

5 Q. If you were aware of what that meant,
6 right?

7 A. I think if you see two young girls and you
8 see 20-plus customers coming to their room within a
9 24-hour period day in, day out, and they're asking
10 for excessive amount of towels and -- I think it's
11 pretty obvious what's going on.

12 Q. Do you know that the hotel knew, though?

13 A. I don't know.

14 Q. Okay.

15 A. It was in your face. I don't see how they
16 couldn't have known.

17 Q. Well, do you know if they knew?

18 A. I don't know that.

19 Q. Did you ever tell anybody at the hotel
20 that you were being held against your will?

21 A. No.

22 Q. Did you ever ask any hotel employee for
23 help?

24 A. No.

25 Q. Did you ever tell any employee of the

1 hotel that you were being trafficked?

2 A. No.

3 Q. Did you ever see any employee of the hotel
4 having sex with [REDACTED]

5 A. No.

6 Q. Did any employee of the hotel ever have
7 sex with you?

8 A. No.

9 Q. Did you ever ask an employee to call a
10 doctor, an ambulance, or get you any type of help?

11 A. No.

12 Q. Did you ask any employee to ever call a
13 family member or a friend or anybody to get you
14 help?

15 A. No.

16 Q. Did you see other customers and guests at
17 the hotel?

18 A. What?

19 Q. Did you see other customers and guests at
20 the hotel?

21 A. Did I see -- Did I see other customers?
22 What?

23 Q. I'm not talking about your customers. I'm
24 talking about customers of the hotel.

25 A. Did I see customers of the hotel?

1 Q. Uh-huh.

2 A. I don't know.

3 Q. Did you see people staying at the hotel?

4 A. I don't know.

5 Q. I'm not saying did you see them as
6 customers. Did you physically with your eyes see
7 people who were staying at that hotel?

8 A. Oh, did I -- Did I see customers of the
9 Red Roof Inn, like physically did I see them?

10 Q. Other guests of the hotel. Did you see
11 them?

12 A. Yes.

13 Q. Did you interact with any of them?

14 A. I don't know.

15 Q. Did anybody ever call the police after
16 seeing you to report you as being either a
17 prostitute or a trafficking victim?

18 A. I don't know. Bagz seemed really
19 comfortable there. All the pimps would hang out
20 there. I mean, there's multiple occasions where
21 I'd be -- where [REDACTED] would be in the room, I'd
22 go to the car, smoke with Bagz while she's seeing a
23 customer, and the multiple pimps hung out there.
24 They'd often blare music outside, smoke together.
25 They'd have their girls there. I just feel like

1 what was going on there was right in front of your
2 face. So I don't know if they knew what was going
3 on there or not.

4 MR. KEITH: Objection.

5 MR. ALLUSHI: Same objection.

6 MR. KEITH: I can't even remember the
7 question I asked, so -- Can you -- Ma'am, could you
8 read my question back for me, please.

9 (Question read back.)

10 THE WITNESS: Not to my knowledge.

11 Q. (By Mr. Keith) Did the police ever show
12 up to try to save you?

13 A. No.

14 Q. Did you ever show signs of being
15 physically beaten while you were at the Red Roof?

16 A. I don't know.

17 Q. Well, you weren't physically beaten --

18 A. No, I meant not me. Maybe [REDACTED]

19 Q. I didn't ask about [REDACTED] I asked about
20 you.

21 A. Okay. Okay. Sorry.

22 Q. So you never showed signs of being
23 physically beaten, correct?

24 A. No.

25 Q. That's correct?

1 A. No. We didn't have enough time. If we
2 did shower or sleep, it'd be in the middle --
3 middle of the night, way middle of the night, early
4 a.m. hours when it's a bit slower.

5 Q. So the money would come to you, and then
6 where would the money go?

7 A. To Bagz.

8 Q. How?

9 A. What was the question?

10 Q. How? How did the money get to Bagz?

11 A. We'd give it to him. He'd ask for it.

12 Q. During the time that you were being
13 trafficked, did you ever go out to eat?

14 A. Not often. We generally survived off
15 vending machine or gas station food.

16 Q. Were you taken to restaurants, though?

17 A. Maybe for a special occasion. If we made
18 a certain amount of money in a certain amount of
19 time, he'd reward us that way and kept our minds
20 thinking we were getting something out of this. He
21 did just enough so we couldn't say, you know, he
22 wasn't doing anything.

23 Q. While you were present at the Red Roof,
24 it's your contention that you were always there as
25 a trafficking victim, right?

1 mind, how can you separate what you say happened to
2 you at the Red Roof from what happened to you at
3 every other hotel where you claim that Bagz made
4 you have sex for money?

5 A. How can I separate them?

6 Q. Uh-huh.

7 A. I don't think I can except for the fact of
8 I just know that those three hotels were on the
9 rotation.

10 Q. Okay.

11 A. He was the most comfortable there for some
12 reason. He didn't seem like he was scared. He'd
13 just flaunt it.

14 Q. Okay.

15 A. It's almost as if he wanted people to
16 know.

17 MR. KEITH: All right. I'm not sure
18 what that last part has to do with my question, so
19 I'm going to object to the last part.

20 THE WITNESS: Okay.

21 Q. (By Mr. Keith) I'm not being mean. I'm
22 just making my record. We're almost done, okay?

23 A. Okay.

24 Q. At least for my part. I don't want you to
25 think -- I don't think I've been mean today, and

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1 That pursuant to information given to the
2 deposition officer at the time said testimony was
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I further certify that I am neither counsel
for, related to, nor employed by any of the parties
in the action in which this proceeding was taken,
and further, that I am not financially or otherwise
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Certif.



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